

## **Exhibit “A”**



THE LAW OFFICES OF  
SEAN MARCUS, PLLC

Miami Office (Main Office)  
7600 W. 20<sup>th</sup> Avenue, Suite 220  
Hialeah, FL 33016  
(305) 607-3907

Broward Office (By Appointment Only)  
7797 N. University Drive, #204  
Tamarac, FL 33321  
(954) 434-4468

June 6, 2022

**Via Certified Mail Return**  
**Receipt Requested**

Pat Jones Cummings  
Legal Counsel - Miami-Dade Corrections  
2525 NW 62<sup>nd</sup> Street  
Miami, FL 33147

**Via Certified Mail, Return**  
**Receipt Requested**

Cassandra Jones  
Interim Director – Miami-Dade Corrections  
2525 NW 62<sup>nd</sup> Street  
Miami, FL 33147

**Via Certified Mail, Return**  
**Receipt Requested**

Geri Bonzon-Keenan  
County Attorney's Office  
111 NW 1<sup>st</sup> Street, Suite 2810  
Miami, FL 33128

**RE:** Our Client: Kevin Rawls  
Date of Incidents: Between September 24, 2018 through December 11, 2019.  
Social Security No.: 589-11-0733  
DOB: 12/14/1990  
Place of Birth: Miami, FL; United States of America

Dear Interim Director Jones:

Please be advised that this firm and the undersigned have been retained to represent Kevin Rawls. This letter is in compliance with the notice provisions of Fla. Stat. § 768.28, Florida Statutes and 28 U.S.C. § 2675. Notice has also been sent to the County Attorney's Office, as well as your legal counsel – Patricia Jones Cummings. This is a claim based upon a violation of my client's civil rights pursuant to 42 U.S.C. § 1983 and any and all state law claims.

Between September 24, 2018 through December 11, 2019, Kevin Rawls was an inmate with the Miami-Dade Department of Corrections. During that time, Mr. Rawls was pending trial for two cases – one of which was dismissed and the other which he was acquitted on. While being forced to stay at the Pretrial Detention Center, the Metro West Detention Center, and the Turner Guilford Knight Correctional Center, Mr. Rawls was repeatedly subjected to abuse, excessive force, and mistreatment by the guards who were charged with taking care of Mr. Rawls. During one incident on September 24, 2018, Mr. Rawls was attacked by a number of the Guards, including but not limited to Officer Collier, Officer Marshall, Officer Rios, and Lieutenant Menard (then, Sergeant Menard). During the course of the attack, the officers broke Mr. Rawls hand. In another incident, occurring on January 8, 2019, Mr. Rawls was confronted by Corporal Anthony Wright and Sergeant Greaves. During this confrontation, the officers pulled Mr. Rawls out of his cell and



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forced him to become involved in a physical altercation with Officer Wright, resulting in significant injuries (both physical and mental) to Mr. Rawls. This incident was the subject of an investigation by both Internal Affairs, and the Miami-Dade Police Department public corruption unit. Following this incident, Mr. Rawls continued to be attacked by various corrections officers for his involvement in these prior incidences (and for "snitching"), until he was transferred from Miami-Dade Corrections custody to the Florida Department of Corrections.

Mr. Rawls has no prior adjudicated unpaid claim in excess of \$200.00.

I would appreciate your contacting me so that we may discuss resolution of this claim without the need for litigation. I appreciate your cooperation and assistance. If you have any questions or issues, please do not hesitate to contact me at the number below.

Sincerely,

Sean T. Marcus, Esq.  
The Law Offices of Sean Marcus, P.L.L.C.  
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Hialeah, FL 33016  
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